



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, Washington 98101

October 12, 2007

Reply To  
Attn Of: ETPA-088

Ref: 07-032-NOA

Douglas P. DeMaster  
National Marine Fisheries Service  
709 W. 9<sup>th</sup> Street  
P.O. Box 21688  
Juneau, AK 99802-1668

Dear Mr. DeMaster:

The U.S. Environmental Protection Agency has reviewed the draft Environmental Impact Statement (EIS) for **Issuing Annual Quotas to the Alaska Eskimo Whaling Commission for a Subsistence Hunt on Bowhead Whales for the Years 2008 through 2012** (CEQ No. 20070315) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the document's adequacy in meeting NEPA requirements.

The EIS proposes to issue annual quotas to the Alaska Eskimo Whaling Commission (AEWC) to allow continuation of its subsistence hunt for bowhead whales from the Western Arctic stock. The proposed action would allow the National Marine Fisheries Service (NMFS) to fulfill its Federal trust responsibilities to Alaskan Natives, and to ensure that any aboriginal subsistence hunt of whales does not adversely affect the conservation of the Western bowhead whale stocks.

The EIS contains three action alternatives that meet the International Whaling Commission's (IWC) two components of no more than 255 whales to be landed during the period of 2008 through 2012 and no more than 67 whale strikes per year with a provision to carryover unused strikes from the previous year. The preliminary preferred alternative would allow for the landing of no more than 255 whales for the 5 year period and 15 unused strikes from the previous year to be added to the annual strike quota.

The EIS does a good job documenting the Alaskan Eskimo tradition of subsistence bowhead whale hunting. In particular, the EIS describes in detail the history and cultural aspects of the whale hunt including how the hunt is an integral part of the social framework of the villages involved. The EIS discusses the widespread sharing of financial resources and equipment to support the hunters, and the sharing of labor in harvesting, processing and distributing subsistence foods. While the EIS discusses the use of non-food portions of the whales for handicrafts such as

baleen baskets, scrimshaw and carvings, it does not discuss the exchange of the non-food portions between villages. The exchange and purchase of non-food portions of the bowhead whale can be an important commodity for Native Alaskan villages involved. This activity should be discussed in the final EIS.

We have assigned a rating of LO (Lack of Objections) to the draft EIS. This rating and a summary of our comments will be published in the Federal Register. A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Mike Letourneau at (206) 553-6382 or feel free to contact me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosure

cc: M. Combes, EPA-AOO